

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Nicholas N. Brown,

Plaintiff,

Versus

Trooper Hunter Green individually and in his  
official capacity; South Carolina Department  
of Public Safety (SCDPS); South Carolina  
Department of Motor Vehicles (SCDMV);  
Charleston County Detention Center,

Defendants.

) C/A No. 2:25-cv-03343-DCN-MHC

)

)

)

)

)

)

)

)

)

)

)

)

**DEFENDANTS TROOPER GREEN,  
SOUTH CAROLINA DEPARTMENT OF  
PUBLIC SAFETY, AND CHARLESTON  
COUNTY DETENTION CENTER'S  
MOTION FOR EXTENSION OF TIME TO  
FILE RESPONSIVE PLEADINGS AND  
RESPOND TO PLAINTIFF'S PENDING  
MOTION FOR SUMMARY JUDGMENT**

COME NOW DEFENDANTS Trooper Hunter Green individually and in his official capacity, South Carolina Department of Public Safety, and "Charleston County Detention Center" (hereinafter collectively referred to as "these Defendants"), by and through their undersigned attorneys, and move this Court for an Order pursuant to Local Civil Rule 6.01 extending the time to June 6, 2025, for these Defendants to file an Answer to Plaintiff's Complaint (ECF No. 1) or otherwise plead, and respond to Plaintiff's Motion for Summary Judgment (ECF No. 7). Pursuant to Local Rule 7.04, a supporting memorandum is not required as a full explanation of the motion is contained within this motion.

The basis for these Defendants' Motion for Extension of Time, is that the undersigned counsel was recently retained to represent these Defendants, and these Defendants require additional materials and information in order to prepare an answer to Plaintiff's Complaint or otherwise plead, as well as additional time to prepare a response to Plaintiff's Motion for Summary Judgment.

*[Signature on following page]*

Respectfully submitted,

**BUYCK LAW FIRM, LLC**

P.O. Box 2424

Mt. Pleasant, SC 29465-2424

Telephone: (843) 377-1400

Facsimile: (843) 284-8105

Email: jeffrey@buyckfirm.com

s/ Jeffrey H. Lappin

Hugh W. Buyck (Fed. ID #6099)

Nina L. Savas (Fed ID # 14246)

Jeffrey H. Lappin (Fed. ID 13568)

Attorneys for Defendants Trooper Hunter  
Green individually and in his official  
capacity, South Carolina Department of  
Public Safety, and "Charleston County  
Detention Center"

May 9, 2025

Mt. Pleasant, South Carolina

**CERTIFICATE OF SERVICE**

I certify that on this date a copy of the foregoing was served on each party or counsel of record by ☒ mailing, ☐ emailing, ☒ e-filing, or ☐ hand delivery in the manner prescribed by the applicable Rule of Civil Procedure.

Copy mailed to:

Nicholas N. Brown  
3128 Terry Drive  
North Charleston, SC 29405

This 9th day of May 2025.

s/Jeffrey H. Lappin